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Attorneys for Defendant Pacific
Life Insurance Company

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRIAN C. TANKO, Ltd; BRIAN
TANKO, and VICTORIA TANKO,

Plaintiffs,

v.

PACIFIC LIFE INSURANCE
COMPANY; CBZ RETIREMENT
SOLUTIONS, LLC; CORY ZIMET;
ECONOMIC CONCEPTS, INC.;
ECI PENSION SERVICES, LLC;
MEDALIST PENSION ADVISORS,
LLC; PENSION STRATEGIES, IBP,
LLC, and KENNETH R.
HARSTEIN,

Defendants

CASE NO: 2:11-cv-02073-GMN-GWF

**DEFENDANTS' JOINT UNOPPOSED
MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

(FIFTH REQUEST)

Insofar as a global resolution of this case appears to be
imminent, Defendants move the Court for a one week extension of time to
respond to Plaintiffs' complaint up to and including April 5, 2012 pursuant
to LR 6-1. The parties have been diligently working to reach an early

1 resolution of this dispute. It now appears that a global resolution of this
 2 case is imminent. As such, a one week extension is requested concerning
 3 this matter. Plaintiffs' counsel has no objection to this request.

4 On November 14, 2011, Plaintiffs commenced this action by filing a
 5 complaint in the Eighth Judicial District Court, Clark County, Nevada. On
 6 December 22, 2011, Pacific Life removed this action to federal court and all
 7 other defendants consented to the removal. The parties have since
 8 conferred in good faith and are presently discussing the potential for an
 9 early resolution of this matter, which now appears to be imminent.

10 This request for an extension is made in good faith and not made for
 11 the purpose of undue delay. Therefore, the Defendants respectfully
 12 requests that the Court grant its motion.

13 Respectfully submitted:

14 MORRIS LAW GROUP

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20 WILSON ELSE


21 By: /s/ David Kahn
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23 Attorney for Defendants Economic
 24 Concepts, Inc.; ECI Pension Services,
 25 LLC; Medalist Pension Advisors, LLC
 and Kenneth R. Harstein

ORDER

It is so ordered. All served Defendants shall have up to and including April 5, 2012 to answer or otherwise respond to the Complaint.

Dated: March 30, 2012.



GEORGE FOLEY, JR.
United States Magistrate Judge

MORRIS LAW GROUP

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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of MORRIS LAW GROUP, and that the following documents were served via electronic service: **DEFENDANTS' JOINT UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT (FIFTH REQUEST)** TO:

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Dated this 29th day of March, 2012.

By: *Pietragallo*